



Organic Centre Wales
Canolfan Organig Cymru

Response on behalf of the Welsh Organic Sector
prepared by Organic Centre Wales, *Aberystwyth University, SY23 3AL*
to the Defra consultation on:

The Socio-economic implications of the commercial cultivation of GM crops

i. Introduction.

- i.i. We welcome the opportunity to respond to this important consultation. This is a significant issue to Wales and in particular to Welsh organic farmers and producers, organic processors, manufacturers and organic brands as well as the Welsh consumer.

- i.ii. The basis of our response is enshrined in the EU organic regulation (No 834/2007) that states in article 9 that *“Genetically modified organisms (GMOs) and products produced from or by GMOs are incompatible with the concept of organic production and consumers’ perception of organic products. They should therefore not be used in organic farming or in the processing of organic products”*¹.

- i.iii. We therefore expect and require that all aspects of organic production and consumption are protected from contamination by genetically modified material.

- i.iv. We would expect any Welsh and UK government to honour this and not to use any suggested changes to the EU GM regulation to water down approvals and ignore real concerns by organic and non-organic farmers and consumers.

- i.v. We support the views of the Austrians that there should be;
 - i.v.i. a more explicit consideration in the environmental risk assessment of regional agricultural, ecological and geographical conditions
 - i.v.ii. a recognition of socio-economic impacts as legitimate factors in the decision and
 - i.v.iii. the right for regions to restrict or prohibit the cultivation of GMOs.

¹ Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91.
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:189:0001:0023:EN:PDF>

1. What is your general view of the idea of taking account of socio-economic factors in decisions on commercial GM cultivation – e.g. what opportunities or challenges do you see?

- 1.1. We welcome the idea of taking into account of socio-economic factors in decisions on commercial GM cultivation as the possible impacts on organic farmers and consumers of GM cultivation in Wales could be great.
- 1.2. Welsh food, and in particular organic food, is thought of high as high quality throughout Wales, the UK and internationally. Much of this quality is based on the authenticity of the products. Any threat of contamination of the product or the food chain would likely lead to a reduction in this confidence, with negative socio-economic impacts. There is a certainty that GM presence in any organic produce (above the EU level 0.9%, although it is possible that this may be set lower by some certification bodies) will see that product lose its organic status.
- 1.3. The opportunities of being able to protect Welsh food from GM contamination must be pursued. We do not underestimate the challenges that this might cause but organic food and its producers must be protected. The financial gain of a new and yet untested GM farming approach in Wales must never be allowed to be at the expense of the incumbent and thriving Welsh organic sector.
- 1.4. We believe that the inclusion of rural socio-economic factors in GM approvals should be set at an EU level with a raft of agreed factors that are comprehensive enough (both depth and breadth) to cover the whole of the 27 member states and implemented in a similar way to the environmental and human safety aspects of GM approvals. The use of socio-economic factors should be implemented in such a way to allow an EU wide ban if the data supports it but nations or regions must be able to use the same raft of factors to be show the need to prohibit the cultivation of GM or to provide GM free zones too.
- 1.5. The inclusion of socio-economic factors in the approval process must not be used to force GM approvals through the EU on the basis that some countries or regions can ban them on a national or regional level due to socio-economic factors. There must be no trade-off with countries voting for approvals at an EU level, even though they have valid concern about the product on human health or environmental grounds, with the sure knowledge that they will ban it in their own country on the socio-economic grounds.

2. If you believe it is a good idea, what specific socio-economic factors or criteria do you think should be taken into account? How should these criteria be defined, assessed and judged (e.g. who would undertake the assessment, and what might the evidence requirements be)?

- 2.1. The socio-economic impact of others growing and using GM products on existing producers or processors must be protected. If there is a threat to the products, their integrity (i.e. contamination) or the production area then this must be taken into account.
- 2.2. The current setting of adventitious presence of GM at 0.9% is a contentious one for many parts of the organic production chain with even the current levels of contamination likely to undermine the organic sector in Wales (as well as the rest of the UK and EU).
- 2.3. In addition there are sectors where it appears to be impossible to keep below these thresholds. Experiences in Bavaria suggest that GM contamination of honey can be a magnitude higher than the 0.9% labelling threshold and a Bavarian court recently ruled that honey containing GM maize pollen could not be sold². We cannot have a situation where the introduction of a new technology to one part of the agricultural sector destroys the livelihood of another.
- 2.4. The possible socio-economic factors need to be identified across the EU and we can draw on the experiences of those in the food chain, rural economies and communities as well as consumers in countries where GM crops are currently being widely grown where it is applicable to EU conditions.
- 2.5. The burden of proof and the associated costs should be borne by those who wish to profit from the utilisation of GM crops in Wales. WAG should commission work specifically to identify what the likely positive and negative socio-economic impacts of growing existing and proposed GM crops in Wales to across the food production, processing and manufacturing sector so that a raft of socio-economic factors can be agreed. These can then be amended and updated as more data is obtained. Those who seek GM approval must demonstrate that any positive socio-economic impacts for the GM industry are not outweighed by wider negative impacts across the food chain and public interests.

3. Are there specific socio-economic criteria that you think should not be taken into account – please explain why?

- 3.1. There is a need for the socio-economic impacts of GM in Wales and the UK to be studied more fully before anything can be counted in or out.

² <http://www.spiegel.de/international/germany/0,1518,611582,00.html>

Evidence or views on socio-economic impacts.

4. Are you aware of evidence of the socio-economic impact in other countries of current GM herbicide-tolerant crops, that you think might be indicative of likely UK impacts should such crops be grown here in the future (please specify)? (please also include copies of, or links to, any relevant published report/studies).

4.1. There is evidence across the world where GM crops have been grown, particularly in the USA where herbicide and insect tolerant varieties have been grown for over a decade. The evidence available on pesticide/herbicide use and its changes over the period³. There is also evidence on the corporate responsibility and the issues of patent right which the most famous is Percy Schmeiser and Monsanto which ended up in the Canadian Supreme Court⁴.

5. What do you think are the potential socio-economic impacts in the UK of possible future types of GM crop (where relevant, please specify by crop type)? (please also include copies of, or links to any relevant published report/studies).

5.1. We would not want to speculate on potential new GM crops for the UK. Over the past 20 years we have been promised that crops that would improve our health, fix their own nitrogen, green the desert, grow on salty land and with increase yields are just around the corner. None of these have been delivered. To date we have crops which are purely to improve the profits of a few companies who produce the inputs they are designed to tolerate or replace. Industry figures for 2008 show that herbicide tolerant crops account for nearly 80 *per cent* GM crops throughout the world⁵ and only 4 (soya, maize, cotton and oil seed rape/canola) crops account for over 99 *per cent* of GM plantings throughout the world and with soya accounting for over 50 *per cent* of this area⁶. Until we can see crops that might be argued to have a benefit to UK and Welsh agriculture and food it is meaningless to speculate on potential socio-economic impacts.

6. Do you have any other comments you would like to make on this issue?

6.1. We wish to reiterate that the inclusion of socio-economic factors in the approval process for the cultivation of GM crops in the EU must not be used to smooth the passage of applications through this process as many member states, regions and EU citizens have legitimate concerns about this process.

³ Benbrook, C. M. (2004). *Genetically Engineered Crops and Pesticide Use in the United States: The First Nine Years*. BioTech InfoNet. Technical Paper Number 7. October 2004. http://organic.insightd.net/reportfiles/Full_first_nine.pdf.

⁴ <http://scc.lexum.umontreal.ca/en/2004/2004scc34/2004scc34.html>

⁵ http://www.gmo-compass.org/eng/agri_biotechnology/gmo_planting/145.gmo_cultivation_trait_statistics.html

⁶ http://www.gmo-compass.org/eng/agri_biotechnology/gmo_planting/257.global_gm_planting_2008.html